

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

MAR 19 2024

U.S. DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

DOCKET NO. 3:24-cr-56-KDB

BILL OF INDICTMENT

v.

Violation: 18 U.S.C. §922(g)(1)
18 U.S.C. §922(o)

SHAKOR DANIELS

THE GRAND JURY CHARGES:

COUNT ONE

(Possession of a Firearm by a Felon)

On or about June 13, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

SHAKOR DANIELS,

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, that is, a Smith and Wesson model SD9, 9mm caliber semi-automatic pistol and a Taurus model G2C, 9mm caliber semi-automatic pistol in and affecting commerce; in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

(Transfer of a Machinegun)

On or about November 8, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

SHAKOR DANIELS,

did knowingly transfer one or more machineguns, as that term is defined in Title 18, United States Code, Section 921(a)(24), to wit: a device intended to convert a semiautomatic, handgun into a machinegun capable of fully automatic fire, without manual reloading, by a single function of the trigger and a device intended to convert a rifle into a machinegun capable of fully automatic fire, without manual reloading, by a single function of the trigger; in violation of Title 18, United States Code, Section 922(o).

COUNT THREE

(Transfer of a Machinegun)

On or about November 13, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

SHAKOR DANIELS,

did knowingly transfer a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(24), to wit: a device intended to convert a semiautomatic, handgun into a machinegun capable of fully automatic fire, without manual reloading, by a single function of the trigger; in violation of Title 18, United States Code, Section 922(o).

COUNT FOUR

(Transfer of a Machinegun)

On or about November 30, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

SHAKOR DANIELS,

did knowingly transfer a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(24), to wit: a device intended to convert a semiautomatic, handgun into a machinegun capable of fully automatic fire, without manual reloading, by a single function of the trigger; in violation of Title 18, United States Code, Section 922(o).

COUNT FIVE

(Possession of a Firearm by a Felon)

On or about November 30, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

SHAKOR DANIELS,

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, a Radical Firearms LLC., RF-15, Multi caliber rifle, in and affecting commerce; in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX

(Possession of a Firearm by a Felon)

On or about January 16, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

SHAKOR DANIELS,

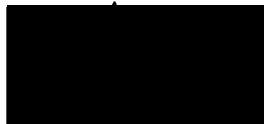
knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, that is, a Heckler and Koch, USP Compact, .40 caliber pistol, in and affecting commerce; in violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of the provisions of 18 U.S.C. § 924(d) and the statutes incorporated or referred to therein. The firearms and ammunition listed below are subject to forfeiture in accordance with § 924(d) because they were involved in, used, or intended to be used in the violation alleged in this bill of indictment. The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

- a) Smith and Wesson model SD9, 9mm semi-automatic pistol, serial number FZH1486
- b) Taurus model G2C, 9mm caliber semi-automatic pistol, serial number ADL957395
- c) Radical Firearms LLC., RF-15, Mult caliber rifle, SN 2-053226
- d) Heckler and Koch, USP Compact, .40 caliber pistol, SN 26-025208
- e) Ammunition
- f) Machine Gun Conversion Devices

A TRUE BILL



FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Tim Sielaff'.

TIM SIELAFF
ASSISTANT UNITED STATES ATTORNEY